

EXHIBIT 18

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ATTORNEYS FOR DEFENDANT JAMES DONDERO

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Case No. 19-34054
HIGHLAND CAPITAL MANAGEMENT, L.P.		§
§		Chapter 11
§		
Debtor.	§	
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HIGHLAND CAPITAL MANAGEMENT, L.P.,		§
§		
Plaintiff.	§	
v.	§	Adversary No. 21-03003-sgj
§		
JAMES D. DONDERO,		§
§		
Defendant.	§	

**DEFENDANT JAMES DONDERO'S OBJECTIONS AND RESPONSES
TO HIGHLAND CAPITAL MANAGEMENT, L.P.'S
SECOND REQUEST FOR ADMISSIONS**

TO: Highland Capital Management, L.P., by and through its attorneys of record, Zachery Z. Annable, Hayward PLLC, 10501 N. Central Expy., Ste. 106, Dallas, Texas 75231.

Defendant James Dondero (“Defendant” or “Dondero”) serves his Objections and Responses to Debtor Highland Capital Management, L.P.’s (“Debtor” or “Highland”) Second Request for Admissions (“Requests”), as follows:

Dated: May 7, 2021

Respectfully submitted,

/s/Deborah Deitsch-Perez

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on May 7, 2021, a true and correct copy of the foregoing document was served via email on counsel for the Debtor.

/s/ Michael P. Aigen
Michael P. Aigen

OBJECTIONS AND RESPONSES¹

REQUEST FOR ADMISSION NO. 1: Admit that in December 2019, James Dondero made a payment to the Debtor, a portion of which was applied to reduce principal and/or interest due under one or more of the Notes.

RESPONSE:

ADMIT.

REQUEST FOR ADMISSION NO. 2: Admit that James Dondero did not file a proof of claim in the Bankruptcy Case concerning or relating to the “mutual obligation” referred to in paragraph 41 of the Amended Answer.

RESPONSE:

ADMIT.

REQUEST FOR ADMISSION NO. 3: Admit that James Dondero did not file a proof of claim in the Bankruptcy Case concerning or relating to the “debt” referred to in paragraph 41 of the Amended Answer.

RESPONSE:

ADMIT.

REQUEST FOR ADMISSION NO. 4: Admit that prior to serving his Amended Answer, James Dondero never informed the Debtor of his belief that any provision of any of the Notes was ambiguous, as alleged in paragraph 45 of the Amended Answer.

RESPONSE:

DENY.

REQUEST FOR ADMISSION NO. 5: Admit that as of the date of the service of these Requests for Admission, James Dondero has not (a) identified any particular provision or clause of any Note that he contends is ambiguous (any such provision or clause, the “Identified Provision”), and (b) informed the Debtor of the Identified Provision.

¹ Defendant makes these responses subject in all respects to his Motion for Withdrawal of the Reference [Adv. Dkt. No. 21] and the Motion to Stay Pending the Motion to Withdraw the Reference of Plaintiff's Complaint [Adv. Dkt. No. 22] filed on April 15, 2021. For the reasons stated in the motions, Defendant believes that the reference should be withdrawn and this proceeding stayed while the motion to withdraw the reference is considered. Defendant does not waive, but instead hereby preserves, his right to a jury trial and all rights and requests for relief asserted in the motions. Defendant does not consent to the Bankruptcy Court determining this proceeding or entering final orders or judgments in this proceeding. Defendant requests that the reference be withdrawn and that the District Court adjudicate this proceeding.

RESPONSE:

DENY.